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June 4, 2018

Terra Marine Attorneys
95, Awolowo Road
SW Ikoyi, Lagos, Nigeria

Attention: Mr Wuyi Ogunyinka

Dear Mr Ogunyinka,

RE: ERIN PETROLEUM NIGERIA LIMITED (PREVIOUSLY KNOWN AS CAMAC PETROLEUM LIMITED) NOTICE OF APPOINTMENT OF RECEIVER/MANAGER

IN RE: ERIN PETROLEUM NIGERIA LIMITED V CREDITORS LOCATED IN NIGERIA SUIT NO. FHC/L/NRJ/3/2018

LETTER FORWARDING APPLICATION TO SET ASIDE REGISTRATION ORDER

We are Counsel to Zenith Bank Plc ("**our Client**"), a Secured Creditor of Erin Petroleum Nigeria Limited (both companies registered under the laws of the Federal Republic of Nigeria).

We are in receipt of your letter dated May 31, 2018, to which our Client was copied. The said letter was addressed to J.K. Randle Professional Services.

This serves to bring to your attention the fact that we have today, June 4, 2018 filed an application before the Federal High Court (coram H.R. Shagari, J.) for an Order setting aside the Order made by the Honourable Court on May 25, 2018 registering the Order of the United States Bankruptcy Court of the Southern District of Texas, Houston Division made on May 1, 2018 in the case of Erin Energy Corporation, *et al* Debtors, with case No. 18-32186.

The said Motion on Notice, Affidavit and Written Address for an Order setting aside the Order made by the Honourable Court on May 25, 2018 registering the Order of the United States Bankruptcy Court of the Southern District of Texas, Houston Division made on May 1, 2018 in the case of Erin Energy Corporation, *et al* Debtors, with case No. 18-32186 are enclosed, for your records.

Please accept our professional regards.

Yours sincerely,

FOR: KENNA PARTNERS



Bridget Osazuwa
Associate



Encl: 1

Cc:

1. J.K. Randle Professional Services,
X KPMG House,
One King Ologunkutere Street,
Park View,
Ikoyi, Lagos
Attention: Bashorun J.K. Randle, FCA; OFR
2. Through: The Registrar (without enclosure)
The Honourable Justice Hadiza R. Shagari
Federal High Court,
Lagos.

Kindly bring to the attention of Her Ladyship.
Thank you.

3. Through Ms. LinhThu Do – Case Manager (without enclosure)
Judge Marvin Isgur
The United States Bankruptcy Court
for the Southern District of Texas,
Houston Division.
Re: Erin Energy Corporation, et al. (Debtor),
Case No. 18-32186

Kindly bring to the attention of
The United States Bankruptcy Judge.
Thank you.

4. Okin Adams LLP (without enclosure)
1113 Vine St. Suite 201, Houston,
Texas 77002.